

# EXHIBIT 105

**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Brittany Herbert. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County in Georgia and my residence address is [REDACTED], Atlanta GA 30310.
3. My polling location is the Pittman Park Recreation Center.
4. At approximately 8:30 am on November 6, 2018, I arrived at my polling location, Pittman Park Recreation Center, to vote in the 2018 Georgia General Election. When I walked into the gym, I observed numerous of voters standing around in an amorphous line.
5. I asked a Poll Worker where I could find the end of the line, and she replied that the polling location was not currently accepting additional voters. She then directed me to take a seat and wait. When I asked how long I would wait, she informed me that she did not know and could not give a definitive answer.
6. It was apparent to me that I could be waiting for an indefinite period of time and that there was no order to the crowd of voters waiting for the precinct to start accepting voters.
7. I decided to leave and come back later because I needed to attend work.

8. I left my job early to arrive before the after-work rush and met my husband at Pittman Park Recreation Center around 4:00 pm. When I arrived, I noticed the room was open to its full capacity – double what it had been in the morning – there were additional voting machines, and a very long line.

9. Volunteers were handing out food and water to voters in the line. Many voters appeared upset and I could overhear voters complaining about how long they were waiting in line to vote.

10. Finally, at approximately 6:30 pm, I reached the front of the line.

11. I overheard the man directly ahead of me speak with the Poll Workers. The Poll Workers informed the man that he was at the wrong precinct and would have to go to the correct precinct in order to vote. Despite his protestations, they would not let him vote and did not offer him a provisional ballot. After waiting in line for over two hours at Pittman Park Recreation Center, the man expressed concerns about being able to travel to his correct precinct and vote before the polls closed.

12. Finally, after two trips to the polls and more than two hours of waiting, I was finally able to cast my ballot.

13. I asked the Poll Workers about the cause for the wait times and one informed me that the Elections Officials combined two precincts in my

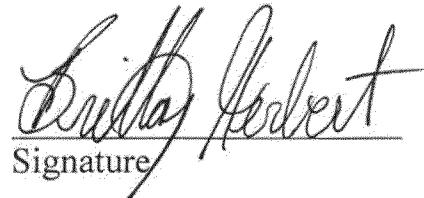
a community that is predominantly African American and of mixed economic status.

14. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

15. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation, *Fair Fight Action v. Raffensperger*, Civil Action No. 1:18-CV-05391-SCJ (N.D. Ga.).

16. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 30<sup>th</sup> day of September, 2019.



Linda Herbst  
Signature